

**MATTHEW J. PLATKIN**  
ATTORNEY GENERAL OF NEW JERSEY  
R.J. Hughes Justice Complex  
25 Market Street, P.O. Box 080  
Trenton, New Jersey 08625  
*Attorney for Proposed Defendant-Intervener*

By: Michael L. Zuckerman  
Deputy Solicitor General  
(862) 350-5800  
Michael.Zuckerman@njoag.gov

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

THE MENDHAM METHODIST  
CHURCH; and THE ZION  
LUTHERAN CHURCH LONG  
VALLEY,

Plaintiffs,

v.

MORRIS COUNTY, NEW JERSEY;  
MORRIS COUNTY BOARD OF  
COUNTY COMMISSIONERS;  
MORRIS COUNTY HISTORIC  
PRESERVATION TRUST FUND  
REVIEW BOARD; and JOHN  
KRICKUS, in his official capacity as  
Commissioner Director for the Morris  
County Board of County Commissioners,

Defendants.

Hon. Evelyn Padin, U.S.D.J.  
Hon. Jessica S. Allen, U.S.M.J.

Docket No. 2:23-cv-2347-EP-JSA

**CIVIL ACTION**

**(ELECTRONICALLY FILED)**

Motion Return Date: November 6,  
2023

**NOTICE OF MOTION TO  
INTERVENE PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 24**

TO: Hon. Evelyn Padin, U.S.D.J.  
Counsel of Record  
via CM/ECF)

PLEASE TAKE NOTICE that on November 6, 2023, the undersigned, Matthew J. Platkin, Attorney General of New Jersey, by Deputy Solicitor General Michael L. Zuckerman, appearing on behalf of Proposed Defendant-Intervenor, Attorney General of New Jersey, shall move before the Honorable Evelyn Padin United States District Judge, in the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, pursuant to Federal Rule of Civil Procedure 24 for an Order permitting the New Jersey Attorney General to Intervene in this matter as a Defendant-Intervenor.

PLEASE TAKE FURTHER NOTICE that the undersigned will rely on the attached Brief in support of the motion.

PLEASE TAKE FURTHER NOTICE that the undersigned respectfully requests that the Court rule upon the moving papers submitted, pursuant to Federal Rule of Civil Procedure 78 and Local Civil Rule 78.1.

A proposed form of Order is attached hereto.

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Michael L. Zuckerman  
Michael L. Zuckerman  
Deputy Solicitor General

Dated: September 25, 2023